

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

KATHY WARREN, TONYA CALHOUN,	)	
CLARISSA ROGERS, and persons	)	
similarly situated,	)	
	)	CASE NO. 3-17-cv-00014
Plaintiffs,	)	
	)	
v.	)	JUDGE TRAUGER
	)	
INTERSTATE WAREHOUSING, INC.,	)	<b>JURY DEMAND</b>
A TIPPMANN GROUP COMPANY,	)	
	)	
Defendant.	)	

**MEMORANDUM OF LAW IN SUPPORT OF JOINT MOTION REGARDING PROPOSED  
SETTLEMENT OF F.R.C.P. 23 CLASS ACTION MATTER**

The parties believe they have reached a resolution of this matter, subject to Court approval. The terms and conditions that have been agreed to by the parties are set out in the proposed Settlement Agreement that is attached to the Joint Motion as Exhibit 3. For the sake of brevity, the terms thereof will not be repeated in this Memorandum of Law. Upon the Court's consideration and approval as set out in the Joint Motion, and the passage of time as the steps contemplated therein are implemented, the matter will be resolved in its entirety.

The resolution that the parties have asked the Court to approve was reached following a good faith and open exchange of information between and among the parties. Direct and transparent conversations were held between counsel for the parties which resulted in a voluntarily scheduled and completed mediation before an experienced mediator with substantial class action and discrimination experience, Reid Estes. All counsel involved in this matter for each side of this dispute are experienced in class and discrimination litigation, including its preparation, investigation, discovery, trial and in this case, the achieved mediated settlement.

In their Joint Motion, and as reflected in the Exhibits thereto, the parties have attempted to cover, and believe they have, all aspects that need to be put in place for their Settlement Agreement to be achieved. Those steps are set out in detail including the sequence, dates, and actions that the parties contemplate and have identified. The parties recognize the need for Court approval of these steps and the ultimate disposition of this matter under F.R.C.P. 23, and have contemplated each in their proposed Settlement Agreement and its exhibits.

Having successfully investigated the respective factual and legal issues involved in this litigation and then engaged in good faith negotiations to resolve the dispute that has resulted in an agreement, the parties respectfully request the Court to grant the Joint Motion and approve the outline therein for resolution of this dispute.

s/Justin S. Gilbert  
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***ATTORNEY FOR PLAINTIFFS***

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing has been served via the Court's CM/ECF system on the 16th day of October, 2017 to counsel of record as follows:

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s/ Justin S. Gilbert \_\_\_\_\_